UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF NEW YORK	X
MARK NUNEZ, et al.,	:
Plaintiffs,	
- against -	: : 11 Civ. 5845 (LTS)(JCF)
CITY OF NEW YORK, et al.,	:
Defendants.	: NOTICE OF JOINT MOTION FOR: FINAL APPROVAL OF CONSENT: JUDGMENTX
UNITED STATES OF AMERICA,	: :
Plaintiff-Intervenor,	: :
- against -	: :
CITY OF NEW YORK and NEW YORK CITY DEPARTMENT OF CORRECTION,	: : :
Defendants.	: : X

PLEASE TAKE NOTICE that, upon the Declaration of Steve J. Martin, dated October 2, 2015 ("Martin Declaration"), the Declaration of Brenda Cooke, dated October 2, 2015, the Declaration of Christina G. Bucci, dated October 2, 2015, and the Joint Memorandum of Law of All Parties in Support of Motion for Final Approval of Consent Judgment, dated October 2, 2015, Rodney Brye, Shameik Smallwood, Travis Woods and Oscar Sanders, as the class representatives of the certified class in this action, through class counsel, Ropes & Gray LLP, Emery Celli Brinckerhoff & Abady LLP, and The Legal Aid Society Prisoners' Rights Project; the United States of America, through its counsel, the United States Attorney's Office for the Southern District of New York; and defendants The City of New York and New York City

Department of Correction, through their counsel, Corporation Counsel for The City of New York, will move this Court, at the Daniel Patrick Moynihan United States Courthouse, 500 Pearl Street, Courtroom 12D, New York, New York 10007, on October 21, 2015 at 2:00 P.M., or at such other date and time as the Court may determine, for an order granting final approval of, and entry of, the proposed Consent Judgment (a copy of which is annexed as Exhibit B to the Martin Declaration).

Dated: New York, New York October 2, 2015

FOR THE PLAINTIFF CLASS:

ROPES & GRAY LLP

By: <u>/s/ William I. Sussman</u>

WILLIAM I. SUSSMAN CHRISTOPHER P. CONNIFF CHRISTINA G. BUCCI 1211 Avenue of the Americas

New York, New York 10036

Telephone: (212) 569-9000

Email: William.Sussman@ropesgray.com Christopher.Conniff@ropesgray.com Christina.Bucci@ropesgray.com

All other signatories listed, and on whose behalf the filing is submitted, consent to its filing.

THE LEGAL AID SOCIETY

By: <u>/s/ Mary Lynne Werlwas</u>

JONATHAN S. CHASAN MARY LYNNE WERLWAS 199 Water Street, 6th Floor New York, New York 10038 Telephone: (212) 577-3530 Email: jchasan@legal-aid.org

mlwerlwas@legal-aid.org

EMERY CELLI BRINCKERHOFF & ABADY LLP

By: /s/ Jonathan S. Abady

JONATHAN S. ABADY
DEBRA L. GREENBERGER
600 Fifth Avenue, 10th Floor
New York, New York 10020
Telephone: (212) 763-5000
Email: jabady@ecbalaw.com
dgreenberger@ecbalaw.com

FOR THE UNITED STATES:

PREET BHARARA United States Attorney for the Southern District of New York

By: /s/ Jeffrey K. Powell

JEFFREY K. POWELL LARA K. ESHKENAZI Assistant United States Attorneys 86 Chambers Street, 3rd Floor New York, New York 10007 Telephone: (212) 637-2706/2758 Email: Jeffrey.Powell@usdoj.gov Lara.Eshkenazi@usdoj.gov

FOR DEFENDANTS:

ZACHARY W. CARTER Corporation Counsel for the City of New York

By: /s/ Celeste Koeleveld
CELESTE KOELEVELD
ARTHUR G. LARKIN
KIMBERLY JOYCE
100 Church Street
New York, New York 10007
Telephone: (212) 356-2300
Email: ckoeleve@law.nyc.gov

alarkin@law.nyc.gov kjoyce@law.nyc.gov